

EXHIBIT F

Emails between counsel



Trey Rothell <tar@randazza.com>

Activity in Case 1:17-cv-10356-PBS Monsarrat v. GOTPER6067-00001 et al Errata

Jay M. Wolman <jmw@randazza.com>

Mon, Oct 23, 2017 at 10:20 AM

To: "rgoren@richardgorenlaw.com" <rgoren@richardgorenlaw.com>

Cc: Staff Two <tar@randazza.com>, Marc John Randazza <mjr@randazza.com>

Dear Richard,

You are the one contending the filing is inappropriate. The burden is on you, as movant. Explain to me why it is improper to file in this court a document that is substantively the same as one your client filed in another. This is why the local rules have the requirement to confer. And we will do so in turn.

What is your deadline in that other case? We can schedule for a time thereafter.

Sincerely,
Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel***Randazza Legal Group, PLLC**

100 Pearl Street, 14th Floor | Hartford, CT 06103

Tel: 702-420-2001 | Email: jmw@randazza.com

* Licensed to practice law in Connecticut, Massachusetts, New York and the District of Columbia.

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On Mon, Oct 23, 2017 at 1:14 PM, rgoren@richardgorenlaw.com <rgoren@richardgorenlaw.com> wrote:

Jay, please stop harassing me. I have other deadlines in other cases.

Either agree that you will file a motion to strike or I will have to do so.

If your interpretation of the facts and the law is correct and Judge Saris so rules you can later file the documents in the public record.

So I most respectfully ask you again, will you file a motion to strike. Yes or no.

If you contend that some filing in another court justifies your actions I suggest you oppose the motion to strike.

Richard

Richard

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From: "Jay M. Wolman" <jmw@randazza.com>

Date: Monday, October 23, 2017 at 12:51 PM

To: "rgoren@richardgorenlaw.com" <rgoren@richardgorenlaw.com>, Staff Two
<tar@randazza.com>

Cc: Marc John Randazza <mjr@randazza.com>

Subject: Re: Activity in Case 1:17-cv-10356-PBS Monsarrat v. GOTPER6067-00001 et al Errata

Richard,

Why are you unwilling to discuss this? That you are a solo practitioner does not relieve you of obligations even a pro se party must abide.

And you seem to have missed what I said before. I did not unilaterally decide to publish the page to the public record. Your client did, in state court, back in 2013. If it was acceptable then, why is it unacceptable now? I would be interested in discussing this with you in its turn, as required under the rules.

Sincerely,

Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*

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On Mon, Oct 23, 2017 at 11:30 AM, rgoren@richardgorenlaw.com <rgoren@richardgorenlaw.com> wrote:

Listen I do have other cases to which I must give attention. You know I am a solo practitioner.

The motion unambiguously seeks an order to file under seal the entire exhibit(s), the entire webpage not just the images.

You decided not to wait for Judge Saris to decide the motion and in your opposition to the motion seeking to seal those webpages in their entirety put into the public record what you unilaterally determined was appropriate to be filed in the public record.

And of course a decision on the motion to file two exhibits to the proposed amended complaint under seal is not necessary if the motion to amend is denied.

Please no more.

Please just tell me yes or no: will you will immediately move to strike from the public record the (redacted) webpages.

Richard

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From: Marc John Randazza <mjr@randazza.com>

Date: Monday, October 23, 2017 at 11:06 AM

To: "rgoren@richardgorenlaw.com" <rgoren@richardgorenlaw.com>

Cc: "Jay M. Wolman" <jmw@randazza.com>

Subject: Re: Activity in Case 1:17-cv-10356-PBS Monsarrat v. GOTPER6067-00001 et al Errata

Richard, your reason for sealing the exhibits was your claim that portions of them were pornographic. Well we redacted the pornographic content. So what is your objection to the redacted exhibits?

Marc John Randazza, JD, MAMC, LLM

Randazza Legal Group

Miami - Las Vegas - Philadelphia - San Francisco

Sent from iPhone (maybe even using Siri). If the message is at all intelligible, it is a minor miracle.

Il giorno 23 ott 2017, alle ore 07:45, "rgoren@richardgorenlaw.com" <rgoren@richardgorenlaw.com> ha scritto:

Plaintiff moved to file the entire exhibits C and D under seal. Without waiting for the Court to decide the issue defendant unilaterally determined to file the exhibits (partially redacted) in the public record.

So I will not move to strike if you commit now to move to strike from the public record the portion of defendant's paper 47-5, that include the exhibits that are the subject of the motion to seal.

I await your response. Will you see to the removal of the "redacted" exhibits from the public record pending the Court's decision on the motion to seal.

As to the motion to amend and my anticipated reply, this morning you now tell me you "still considering whether to file any opposition to the motion for leave to amend." But you previously informed me you would oppose the

motion to amend on futility grounds; you unequivocally informed me the amended complaint's claim of infringement was frivolous on statute of limitations grounds.

Richard

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From: "Jay M. Wolman" <jmw@randazza.com>

Date: Monday, October 23, 2017 at 10:23 AM

To: "rgoren@richardgorenlaw.com" <rgoren@richardgorenlaw.com>

Cc: Marc John Randazza <mjr@randazza.com>

Subject: Re: Activity in Case 1:17-cv-10356-PBS Monsarrat v. GOTPER6067-00001 et al Errata

Dear Richard,

As you are aware, Local Rule 7.1(a)(2) requires us to confer; even though the Judge stated she allows reply briefs, she did not waive compliance with the rule. Once more, it seems, you are refusing to do comply. We asked you to share your putative amended complaint before filing the motion for leave to amend; you did not. You did not provide us with a reasonable opportunity to confer before filing your ill-advised motion to seal. You now seem to wish to file a motion to strike without conferring. And, though you have requested to confer regarding two potential replies (one which is not even ripe since we are still considering whether to file any opposition to the motion for leave to amend), you wish to do